

February 17, 2021

**VIA ELECTRONIC FILING**

Michael Law  
President and Chief Executive Officer  
Alberta Electric System Operator  
2500, 330 - 5 Avenue SW  
Calgary, Alberta  
T2P 0L4

RE: *North American Electric Reliability Corporation*

Dear Mr. Law:

The North American Electric Reliability Corporation (“NERC”) hereby submits Notice of Withdrawal of the North American Electric Reliability Corporation for Proposed Reliability Standard CIP-002-6. NERC requests, to the extent necessary, a waiver of any applicable filing requirements with respect to this filing.

NERC understands the AESO may adopt the proposed reliability standards subject to Alberta legislation, principally as established in the *Transmission Regulation* (“the T Reg.”). Briefly, it is NERC’s understanding that the T Reg. requires the following with regard to the adoption in Alberta of a NERC Reliability Standard:

1. The AESO must consult with those market participants that it considers are likely to be directly affected.
2. The AESO must forward the proposed reliability standards to the Alberta Utilities Commission for review, along with the AESO’s recommendation that the Commission approve or reject them.
3. The Commission must follow the recommendation of the AESO that the Commission approve or reject the proposed reliability standards unless an interested person satisfies the Commission that the AESO’s recommendation is “technically deficient” or “not in the public interest.”

Further, NERC has been advised by the AESO that the AESO practice with respect to the adoption of a NERC Reliability Standard includes a review of the NERC Reliability Standard for applicability to Alberta legislation and electric industry practice. NERC has been advised that, while the objective is to adhere as closely as possible to the requirements of the NERC Reliability Standard, each NERC Reliability Standard approved in Alberta (called an “Alberta reliability standard”) generally varies from the similar and related NERC Reliability Standard.

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NERC requests the AESO withdraw Proposed Reliability Standard CIP-002-6.

Please contact the undersigned if you have any questions concerning this filing.

Sincerely,

/s/ Lauren Perotti

Lauren Perotti  
*Senior Counsel for the North American Electric  
Reliability Corporation*

**BEFORE THE  
ALBERTA ELECTRIC SYSTEM OPERATOR**

**NORTH AMERICAN ELECTRIC )  
RELIABILITY CORPORATION )**

**NOTICE OF WITHDRAWAL OF THE  
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION  
FOR PROPOSED RELIABILITY STANDARD CIP-002-6**

The North American Electric Reliability Corporation (“NERC”) hereby submits this notice of withdrawal for proposed Reliability Standard CIP-002-6.

**I. Background**

On June 22, 2020, NERC submitted a Notice of Filing of proposed Reliability Standard CIP-002-6.<sup>1</sup> In the filing, NERC also sought the retirement of currently effective Reliability Standard CIP-002-5.1a.

**II. Support for Withdrawal**

At its February 4, 2021 meeting, the NERC Board of Trustees approved a resolution to withdraw proposed Reliability Standard CIP-002-6.<sup>2</sup> NERC therefore provides notice of withdrawal of NERC’s June 22, 2020 Notice of Filing of proposed Reliability Standard CIP-002-6 and the retirement of currently effective Reliability Standard CIP-002-5.1a. In light of recent cybersecurity events and the evolving threat landscape, NERC asserts that additional caution is warranted regarding any criteria that may permit more entities to categorize Bulk Electric System (“BES”) Cyber Systems as low impact, such as the revisions proposed in CIP-002-6, and

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<sup>1</sup> *Notice of Filing of Proposed Reliability Standard CIP-002-6* (June 22, 2020).

<sup>2</sup> *See* NERC Board of Trustees February 4, 2021 Agenda Package Item 7.b, available at [https://www.nerc.com/gov/bot/Agenda%20highlights%20and%20Mintues%202013/Board\\_Open\\_Meeting\\_Agenda-Feb-4-2021\\_PUBLIC\\_ONLY.pdf](https://www.nerc.com/gov/bot/Agenda%20highlights%20and%20Mintues%202013/Board_Open_Meeting_Agenda-Feb-4-2021_PUBLIC_ONLY.pdf).

recommends further study. As a result, NERC withdraws proposed Reliability Standard CIP-002-6 until NERC has had the opportunity to reevaluate the criterion based on additional data and studies.

Respectfully submitted,

/s/ Marisa Hecht

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*Counsel for the North American Electric Reliability Corporation*

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